

**LOCAL BANKRUPTCY FORM 5071-1**  
**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE MIDDLE, DISTRICT OF PENNSYLVANIA**

IN RE: Timothy A Neff and Barbara J. Neff  
Debtors.

CHAPTER 13

Nationstar Mortgage LLC d/b/a Mr. Cooper  
Plaintiff(s)/Movant(s)

BANKRUPTCY NO. 18-02332/RNO

ADVERSARY NO. \_\_\_\_ - \_\_\_\_ -ap- \_\_\_\_  
(If applicable)

vs.

Nature of Proceeding: Motion for Relief

Timothy A Neff and Barbara J. Neff  
Debtors/Respondents

Pleading: Motion for Relief

Document # 57

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance<sup>2</sup>.  
Reason for the continuance.

Borrower has entered into a Pandemic Forbearance where post-petition payments will resume November 18, 2020. Parties are not ready to enter into a stipulation at this time, in case, the borrower needs an extension. Parties request the MFR hearing be moved til some time in November.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Respectfully submitted,

Dated: 08/24/2020

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